

0008

From: Jerriann Ernsten
To: John Gefferth
Date: 2/4/2008 2:03 PM
Subject: Emery Side by
Attachments: Emery Things to Do for side by.doc

*Outgoing
2/015/0015
JK*

CC: Joe Helfrich; Pam Grubaugh-Littig; Steve Christensen
Here is my list that I promised. If you have any questions, call me so we don't have to go through any iterations!!!

Thanks,

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Emery side by side deficiencies. 02042008 JAE

John,

Your list of Things to Do WINS!!! I think with the suggestions below, and our group more on board, the next time I go through confidential it should not be as bad – I hope.

- 1 Understand that only certain items may be submitted as confidential or protected
 - a Confidential R645-300-124.300
 - b Protected by Grama

Private information (according to the Government Records Access Management Act [GRAMA]) refers to personal information such as a social security number or tax identification number needed for the ownership and control information required.

Protected information under GRAMA refers to the location of historic, cultural or biological resources (i.e. raptor locations).

Confidential information in the Utah Coal Regulatory Program refers to the analysis of the physical and chemical properties of the coal to be mined, except information on components of such coal which are potentially toxic to the environment, and information on the nature and location of archeological resources on public land and Indian lands as required under the Archeological Resources Protection Act of 1979 (cultural and historic information).

- 2 Follow confidential submittal format guide sent to you in 2005 and again last week. This includes that all submittals with confidential documents/text must be clearly separated and marked. Jerriann suggested that the confidential could be submitted in a red folder or red expandable marked confidential in huge letters. The non-confidential could be submitted in a manila folder or manila expandable. The cover letter and C1C2 would clearly describe the two separate and clearly marked parts to the submittal. This will help our staff know where to properly save scanned files on our data base (public vs confidential) and file as Incoming (public or confidential).
- 3 Submit new MRP binders (public and confidential) for the SLO and perhaps the PFO. The SLO and PFO will no longer have 3 volumes for Chapt 5, therefore only submit 2 volumes for chapt 5 not 3.

John insisted that he keep the reams of confidential documents in the original binders instead of creating a MRP-CB separated by chapters as the SLO has. This creates the following concerns 1) makes the side by side meaningless because the volumes are still off, 2) does not allow the agency to converse easily over the phone to compare documents within the binders 3) will create problems with pagination, 4) will create problems when he provides citations from his volumes, since his number of volumes and names of volumes will always be different. The Division highly advises John to make the suggested change to make all volumes the same between the SLO and his copy. We believe that making these changes will help expedite our customer service.

- 4 Submit C1C2 to incorporate following for all SLO and PFO MRP public binders

- a Clearly and uniformly labeled cover and spine. Make sure you present the right volume title, such as Chap 5 1of 2 NOT 1of 3.
 - b Fully described set of tab pages that clearly indicate the text, figures, plates, appendices.....

- 5 Submit C1C2 to incorporate the following for the SLO MRP-CB
 - a Clearly and uniformly labeled cover and spine. Currently we have two binders. This is what I would approve for the MRP-CB in addition to other information that you will need to provide.
 - i MRP- CB (at top)
 - i Chap V
 - ii MRP – CB (at top)
 - i Chap IX
 - ii Chap X
 - iii Chap XII
 - iv Chap XIII
 - b Make sure that you include the words MRP-Confidential Binder. This is to try to help everyone get on the same page that the confidential for the MRP does not go into a general confidential area of the PIC room, but rather in the MRP-CB. There have been times that you have submitted documents for incorporation and they never have been incorporated into your MRP-CB – they just float around wherever. This problem is because that they have been submitted and not clearly marked as well as the MRP-CB not being clearly marked and tabbed.
 - c Fully described set of tab pages that clearly indicate the chapter (associated MRP-public volume), text, figures, plates, appendices. Here is what I would approve for tabs for the MRP-CB:
 - i Chap V Plates
 - ii Chap IX Plates
 - iii Chap X (this is where that lone page will go)
 - iv Chap X Appendices
 - v Chap X Figures
 - vi Chap X Plates
 - vii Chap XII Appendices
 - viii Chap XIII Appendices

- 6 Submit C1C2 to relocate confidential information from the SLO MRP public volumes to the SLO MRP-Confidential Binders (note, that the confidential information has already been removed from the PFO volumes – only the SLO will have confidential records). **AND** Submit C1C2 to incorporate relocation pages for SLO and PFO MRP public volumes.
 - a Chap 5: RELOCATE & PROVIDE RELOCATION PAGES
 - i Drill logs
 - ii Plates 7-9 (3)
 - iii Plates 10-16 (7)
 - b Chap 10: RELOCATE & PROVIDE RELOCATION PAGES
 - i Page 2 with descriptions

- c Chap 12: RELOCATE & PROVIDE RELOCATION PAGES
- i MOAC 05-177

John wanted to submit all pages like page 2 to state Chap 10 – 2 in the footer instead of having just page 2.

- 7 Submit C1C2 to provide new table of contents for all chapters (public volumes) that you relocated confidential. I think that John wanted to include the information that certain pages, appendices, plates....are in the related portions of the MRP-CB.
- 8 Submit C1C2 to provide new table of contents for all chapters (related confidential sections of the MRP-CBs). What I envision when I open a MRP-CB e.g., chap 10
 - a tab page marking the beginning of chap 10
 - b chap 10 table of contents (just a copy of what you would find in the MRP-Chap 10 public volume)
 - c any confidential text
 - d tab page for Plates
 - e Confidential Plates
 - f tab page for figures
 - g confidential figures
 - h tab page for appendices
 - i confidential reports
- 9 Submit C1C2 to provide the report that was approved for the IBC (incorporated 3/16/2007). We do not have record of that report. If that report had not been reviewed, then it will have to be reviewed by the staff. The MRP Chap XIII binder has a relocation page. I think that John wanted to re-do his relocation pages to include more information, such as the MOAC #. He wanted to do this so it is easier to track items once they come up missing such as this one.
- 10 Submit C1C2 to provide an updated Plate 10-1 that is clearly marked Confidential on the plate and on the plastic sleeve. Need relocation page for Plate 10-1 in Chapt 9, yes 9.
- 11 Note that I may need to include more requests once I figure out the problem with the MEP. Remember, there was no organization to the blue binder marked Emery Appendix B or to the purple incoming confidential folder. I have pulled the incoming from the public area and found what I think might be the entire submittal, but need to check.
- 12 Submit C1C2 to resubmit MOAC 07-33. Our latest copy (incoming, 03122007) still has the wrong title. We will use the Imams and color picks provided with the 02202007 submittal (for our incoming records we will just provide black/white copies).